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13 Attorneys for Defendant
ROBERT JACOBSEN

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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 UNITED STATES OF AMERICA,

Case No. 3:15-cr-00518-MMC-1

19 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER MODIFYING BAIL
CONDITIONS**

20 v.

21 ROBERT JACOBSEN,

22 Defendant.

23

24 The parties hereby stipulate and move this Court to enter an order allowing Defendant
25 Robert Jacobsen to travel to the Long Barn and Nevada City/North Yuba River areas in the
26 Eastern District of California, as well as to the wine country region of the Northern District of
27 California, from and including July 22, 2016, to and including July 24, 2016, solely for the
28 purposes of attending a wedding, helping his daughter to move, and attending a vacation.

FILED

JUL 22 2016

**SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

1 Mr. Jacobsen is currently out of custody awaiting trial. The conditions of his pretrial
2 release currently impose a curfew and limit his travel to the Northern District of California. Mr.
3 Jacobsen is under the supervision of Pretrial Services and has had no violations of the terms of his
4 pretrial release. His Pretrial Services Officer, Timothy Elder, does not object to this request.

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6 **IT IS SO STIPULATED.**

7 DATED: July 20, 2016

Respectfully submitted,

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By: /s/Benjamin Kingsley
BENJAMIN KINGSLEY
Assistant United States Attorney

Respectfully submitted,

COBLENTZ PATCH DUFFY & BASS LLP

By: /s/Timothy P. Crudo
Timothy P. Crudo
Attorneys for Defendant
ROBERT JACOBSEN

[PROPOSED] ORDER

20 GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED that Defendant Robert
21 Jacobsen is permitted to travel to the Long Barn and Nevada City/North Yuba River areas in the
22 Eastern District of California, as well as to the wine country region of the Northern District of
23 California, from and including July 22, 2016, to and including July 24, 2016, solely for the
24 purpose of attending a wedding, helping his daughter to move, and attending a vacation.

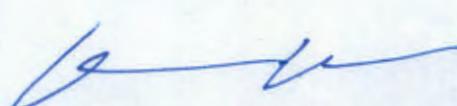
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DATED: 7/22, 2016


UNITED STATES MAGISTRATE JUDGE
Mark W. Vabors